

SM

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Jhave'll Giovon Moore Sr.

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

1:22-cv-01409

Judge Edmond E. Chang

Magistrate Judge Heather K. McShain

PC6

RANDOM

vs.

Case No: _____
(To be supplied by the Clerk of this Court)

Maywood Police Dept.
Officer Smith
Officer Dolan

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

RECEIVED
RECEIVED

MAR 17 2022

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT
CLERK, U.S. DISTRICT COURT

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

I. Plaintiff(s):

- A. Name: Jhave'll Giovon Moore Sr.
- B. List all aliases: N/A
- C. Prisoner identification number: 20210823093
- D. Place of present confinement: Cook County Correctional Center
- E. Address: P.O. Box 089002, Chicago IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Maywood Police Dept
 Title: Maywood Police Dept
 Place of Employment: Maywood Police Dept
- B. Defendant: Officer Smith
 Title: Police Officer of Maywood Police Dept
 Place of Employment: Maywood Police Dept
- C. Defendant: Officer Dolan
 Title: Police Officer of Maywood Police Dept
 Place of Employment: Maywood Police Dept

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III List ALL lawsuits you (and your coplaintiffs, if any) have filed in any state or federal court in the United States

A. Name of case and docket number: Moore Vs Chicago Police Officers of Chicago Police

B. Approximate date of filing lawsuit: N/A

C. List all plaintiffs (if you had co-plaintiffs), including aliases

D. List all Defendants: Chicago Police Department, Chicago Police Officers

E. Court in which the lawsuit was filed: Northern District

F. Name of Judge to whom case was assigned: N/A

G. Basic claim made: Civil 1983

H. Disposition of this case: Settled

I. Approximate date of disposition: N/A

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Moore Vs Maywood Police
- B. Approximate date of filing lawsuit: N/A
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

- D. List all defendants: Maywood Police, Officer Diaz,
other Maywood police officers
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District
- F. Name of judge to whom case was assigned: N/A
- G. Basic claim made: Civil 1983
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Settled
- I. Approximate date of disposition: N/A

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On November 25, 2019 I was standing outside friends apartment building. I was not in nor was I driving any car. Defendant Officers Dolan and Smith approached me and as I was walking away officer Dolan tackled me to the ground causing a deep and painful cut to my hand. While I was on the ground complying with officers, officer Dolan punched me in the face three times, officer Smith did nothing to stop this use of force which ruptured a blood vessel in my eye. I knew it would make a bad situation worst to resist and did not do so. Defendant Officers Dolan and Smith took me to the maywood police station. While I was at the station officer Dolan grabbed me from behind and choked me and Officer Smith attempted to rip my earrings out my ears. After I was at the police station police searched a car and allegedly found a firearm. I had not been in this car. Despite this I was falsely charged with multiple crimes related to the arrest. I had no weapon and was not driving

any car and did not resist arrest or batter the officers. Police falsely arrested me without probable cause and used excessive force against me during the arrest and during my time at the police station violations of the Fourth ~~Amend~~ Amendment and 42 U.S.C 1983.

The Village of Maywood is the employer of officers Dolan and Smith and is required to indemnify the officers for any judgment against them. Officers Dolan and Smith were acting in the scope of their employment and under color of law at the time they did these actions against me. As a result of these actions of the defendants, I was incarcerated, suffered serious emotional and physical injury, pain and suffering and financial loss. Additionally, in 2016 I filed a lawsuit against the Maywood police department and received a settlement. Since I filed this lawsuit Maywood Police officers, including Dolan and Smith have harassed me. Upon information and belief, Defendants Nov 25, 2019 false arrest and attack on me was made in retaliation for my prior exercise of my First Amendment rights. While I was in police car, officer Dolan said to me "all you're gonna do is sue us again", a reference to my prior lawsuit, my lawsuit states claims under the Fourth Amendment (False arrest and Excessive force and failure of officer Smith to intervene while officer Dolan brutalized me on the ground. The First Amendment (for retaliation regarding my constitutionally protected prior lawsuit for misconduct in the department) and state law for indemnification against the village, I respectfully demand trial by jury to correct this injustice

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I would like the officers fired and charges brought
against them, I would like an official apology, I would
like financial compensation.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 5 day of Nov, 20 21

Quill Moore Sr.
 (Signature of plaintiff or plaintiffs)

Jhave'll Giovon Moore Sr.
 (Print name)

20210823093
 (I.D. Number)

#1) P.O Box 089002, Chicago IL 60608
#2) 1615 Washington Blvd Maywood IL 60153

(Address)

Legal Mail

I have'll Moore # M18993

3820 E Main St

Danville IL 61834

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CLERK, U.S. DISTRICT COURT

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INMATE
CORRESPONDENCE



US POSTAGE
PINEY BOWES

ZIP 61834 \$001.76
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0000361013 MAR 14 2022

Prisoner Correspondent
United States District Court

6060431704 CC05

219 Dearborn St 20th Floor
Chicago, IL 60604

Legal Mail !



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